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July 15, 2022

**Via ECF**

The Honorable Michael A. Hammer,  
United States Magistrate Judge  
Martin Luther King, Jr. Federal Building  
And Courthouse, 2<sup>nd</sup> Floor  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *Bianchi v. Samsung Electronics America, Inc. et al.***  
**Civil Action No.: 2:17-cv-01263-CCC-MAM**

Dear Judge Hammer:

This firm, along with Squire Patton Boggs (US) LLP, represents defendant, Samsung Electronics America, Inc. ("SEA") in the above-referenced matter. As per Your Honor's direction in the Order of June 2, 2022, we are providing a joint status report.

The parties respectfully request that a 60-Day Order not be entered at this time. Although a Settlement Agreement was reached between the parties following an extended mediation with the Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.), the novel settlement structure, which seeks to settle claims on an individual basis, requires a final step in the process. The parties agreed in the Settlement Agreement that keeping the case active was the best way to motivate both sides to finish the process. Accordingly, the parties request that the Court allow us to continue to provide periodic updates. We anticipate the process will finish-up in approximately four and a half months. Finally, Judge Cavanaugh has asked me to advise Your Honor that he will personally update you next week.

The Honorable Michael A. Hammer  
United States Magistrate Judge  
July 15, 2022  
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Respectfully,

/s/ James J. O'Hara

JAMES J. OHARA

*On behalf of Defendant,*

*Samsung Electronics America, Inc.*

Respectfully,

/s/ Kevin Laukaitis

*On behalf of Plaintiffs*

Cc: Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.)